

1 HANSON BRIDGETT LLP
 KURT A. FRANKLIN, SBN 172715
 2 kfranklin@hansonbridgett.com
 SAMANTHA WOLFF, SBN 240280
 3 swolff@hansonbridgett.com
 425 Market Street, 26th Floor
 4 San Francisco, California 94105
 Telephone: (415) 777-3200
 5 Facsimile: (415) 541-9366

6 HANSON BRIDGETT LLP
 TYSON M. SHOWER, SBN 190375
 7 tshower@hansonbridgett.com
 LANDON D. BAILEY, SBN 240236
 8 lbailey@hansonbridgett.com
 500 Capitol Mall, Suite 1500
 9 Sacramento, California 95814
 Telephone: (916) 442-3333
 10 Facsimile: (916) 442-2348

11 OTTEN LAW, PC
 VICTOR OTTEN, SBN 165800
 12 vic@ottenlawpc.com
 KAVITA TEKCHANDANI, SBN 234873
 13 kavita@ottenlawpc.com
 3620 Pacific Coast Highway, #100
 14 Torrance, California 90505
 Telephone: (310) 378-8533
 15 Facsimile: (310) 347-4225

16 Attorneys for Plaintiffs
 CORY SPENCER, DIANA MILENA REED, and COASTAL PROTECTION
 17 RANGERS, INC.

18 **UNITED STATES DISTRICT COURT**
 19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 20

21 CORY SPENCER, an individual;
 22 DIANA MILENA REED, an
 individual; and COASTAL
 23 PROTECTION RANGERS, INC., a
 24 California non-profit public benefit
 corporation,

25 Plaintiffs,

26 v.
 27

28 LUNADA BAY BOYS; THE

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' PROPOSED
 PROTECTIVE ORDER AND
 PROPOSED STIPULATION AND
 ORDER REGARDING PLAINTIFFS'
 MOTION TO COMPEL
 PRODUCTION BY DEFENDANT
 BRANT BLAKEMAN**

Hon. Rozella A. Oliver

Complaint Filed: March 29, 2016
 Trial Date: November 7, 2017

1 INDIVIDUAL MEMBERS OF THE
2 LUNADA BAY BOYS, including but
3 not limited to SANG LEE, BRANT
4 BLAKEMAN, ALAN JOHNSTON
5 AKA JALIAN JOHNSTON,
6 MICHAEL RAE PAPAYANS,
7 ANGELO FERRARA, FRANK
8 FERRARA, CHARLIE FERRARA,
9 and N. F.; CITY OF PALOS
10 VERDES ESTATES; CHIEF OF
11 POLICE JEFF KEPLEY, in his
representative capacity; and DOES
1-10,

Defendants.

12 In compliance with this Court's January 25, 2017, Plaintiffs met and
13 conferred with counsel for Defendant Blakeman in an attempt to reach
14 consensus regarding a protective order and proposed protocol for the review
15 of data responsive to Plaintiffs' request for production of documents.

16 While the parties differ in their proposed review protocol, it appears
17 their protective orders are substantially similar. Prior to this filing, Plaintiffs
18 had accepted Defendant Blakeman's proposed protective order and
19 suggested minor non-substantive changes due to grammatical or spelling
20 errors and spacing modifications in the version proposed by Defendant
21 Blakeman. For reasons unknown at the time of this filing, Defendant
22 Blakeman rejected Plaintiffs' proposed minor modifications. Plaintiffs
23 therefore submit their proposed protective order and proposed review
24 protocol for this Court's consideration.

25 ///

26 ///

27 ///

28 ///

1 DATED: Februarv 24. 2017

HANSON BRIDGETT LLP

2
3 Bv: /s/ Samantha D. Wolff
4 KURT A. FRANKLIN
5 SAMANTHA D. WOLFF
6 Attorneys for Plaintiffs
7 CORY SPENCER, DIANA MILENA
8 REED, and COASTAL PROTECTION
9 RANGERS, INC.
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28